

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ESTHER POWERS, §
§
Plaintiff, §
§
v. § Civil Action No.:
§
CENTRAL CREDIT SERVICES, §
LLC, §
§
Defendant. §

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, defendant, Central Credit Services, LLC (CCS), by counsel, notices the removal of this action, pursuant to 28 U.S.C. §§ 1331, 1441, and 1446 *et seq.*, to the United States District Court for the District of New Jersey. In support of this Notice of Removal, CCS states as follows:

1. On or about February 3, 2016, plaintiff, Esther Powers (plaintiff),

commenced a civil action in the Superior Court of New Jersey, Burlington County, New Jersey, entitled and captioned *Esther Powers v. Central Credit Services, LLC*, Case No. L-26816 (hereinafter the “State Court Action”). No further proceedings before the State Court have occurred.

2. In the Complaint, plaintiff alleges statutory causes of action against CCS under the Federal Fair Debt Collection Practices Act (FDCPA), 15 U.S.C. § 1692, *et seq.*

A true and correct copy of the Complaint is attached hereto as Exhibit “A.”

3. On February 5, 2016, CCS was served with a copy of the Complaint.

4. The time within which CCS is required by the laws of the United States, 28 U.S.C. § 1446(b), to file this notice of removal has not yet expired.

5. The Superior Court of New Jersey, Burlington County, New Jersey is located within the United States District Court for the District of New Jersey. Therefore, venue for purposes of removal is proper because the United States District Court for the District of New Jersey embraces the place in which the removed action was pending. 28 U.S.C. § 1441(a).

6. For the reasons described below, this Court has jurisdiction over the State Court Action pursuant to 28 U.S.C. § 1331 because plaintiff's Complaint alleges a cause of action arising under the laws of the United States.

7. Specifically, plaintiff alleges CCS violated provisions of the Fair Debt Collection Practices Act (FDCPA), 15 U.S.C. § 1692, *et seq.*

8. Because plaintiff affirmatively alleges violations of the FDCPA, the Complaint asserts a federal question under 28 U.S.C. § 1331 and is removable pursuant to 28 U.S.C. § 1441.

9. CCS will promptly file a Notice of Filing of this Notice of Removal with the clerk of the United States District Court for the District of New Jersey, and will serve the same on all adverse parties to this action. *See Exhibit "B."*

WHEREFORE, defendant, Central Credit Services, LLC, gives notice that this action is removed from the Superior Court of New Jersey, Burlington County, State of New Jersey, to the United States District Court for the District of New Jersey.

Dated: March 7, 2016.

Respectfully submitted,

/s/ Ross S. Enders, Esq.
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*Attorney for Defendant,
Central Credit Services, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on Monday, March 07, 2016, a copy of the foregoing was electronically filed with the Clerk of the Court and sent via regular mail upon all parties of record.

By: /s/ Ross S. Enders, Esq.
Ross S. Enders, Esq.

*Attorney for Defendant,
Central Credit Services, LLC*